

MEMO ENDORSED.

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June 10, 2025

Application GRANTED.**SO ORDERED.**

Honorable Oma T. Wang
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007



Ona T. Wang
U.S.M.J. 6/11/2025

Re: Wickland v. The City of New York, et al.
Case: 22-cv-01554 (RA)(OTW)
LBBS File No.: 55028.14

Dear Magistrate Judge Wang:

We represent New York City Health and Hospitals Corporation, Dr. Poulakos, Dr. Hajain, Dr. Johnston-Rodriguez, Dr. Eckroth and Dr. Gala (the “NYCHHC defendants”) in this matter and write on behalf of the parties jointly requesting a final eight-day enlargement of time in which to move for summary judgment from June 12 to June 20, 2025. This Court previously extended the time to move on three occasions for various reasons.

The parties are all well into drafting their motions. However, we are engaged in attempts to coordinate the joint filing of common exhibits since they include a nearly 1000-page medical record and 20 transcripts. To that end, we also seek the court’s permission to have one party upload all common exhibits to be referenced by all parties.

We therefore respectfully request that the Court extend the parties’ time to move for summary judgment one final time by one week to June 20, 2025, and grant leave to have the parties reference a single uploaded set of common exhibits.

Respectfully,



Eldar Mayouhas of
LEWIS BRISBOIS BISGAARD &
SMITH LLP